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BY FACSIMILE

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*Re: IP Learn, LLC v. Saba Software, Inc.*

Dear Jon:

I am writing to follow up on Saba's production of various sets of documents in this case. Now that you have Saba's core product documentation showing the functionality of Saba's products (produced in July 2002), tens of thousands of pages of additional product documentation (produced in October 2002), source code (produced in December 2002 and January 2003), and product development documents (produced today), we invite you to revise your preliminary infringement contentions ("PICs").

As you are undoubtedly aware, IP Learn's original PICs, served on November 27, 2002, are woefully inadequate and hardly identify any concrete basis for infringement of IP Learn's patents. Indeed, they do not even identify a Rule 11 basis for infringement. In order to narrow the range of issues that may be raised in upcoming proceedings, Saba hereby invites IP Learn to amend its PICs during the next several weeks. Of course, in order to give Saba sufficient time to review any amended PICs in advance of the summary judgment briefing, we would ask that you provide us with any amendments by no later than February 12, 2003.

Please feel free to contact me if you have any questions.

Very truly yours,

Frederick S. Chung